

**REMARKS**

Claims 1, 4, 6, 9, 11 and 14 have been amended.

Claims 1 - 15 are present and pending in the subject application.

In the Office Action dated August 17, 2006, the Examiner has requested the listing of related applications in the specification to be updated, and has rejected claims 1 - 15 under 35 U.S.C. §103(a). Favorable reconsideration of the subject application is respectfully requested in view of the following remarks.

The Examiner has requested the listing of related applications in the specification to be updated. Accordingly, the specification has been amended to include the patent numbers for corresponding listed patent applications that have issued.

The Examiner has rejected claims 1 - 15 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,606,633 (Tabuchi) in view of The McGraw-Hill companies publication.

Briefly, the present invention is directed toward a system, method and data storage device for creating and storing a content object in a data repository as a group of hierarchically related content entities. Each content entity is contained in a separate file object. A list or outline containing container and non-container identifiers defines the content, order and structure of the content object. This list or outline is stored as a separate file object.

In order to assist in an understanding of the present invention, the present invention features may be illustrated by the following example with respect to generation of a content object in the form of a book. The book structure may include volumes each with one or more chapters, where each chapter, in turn, may include one or more sections. The content of the

chapter sections resides in the data repository as individually accessible files each containing a section (or content entity). The present invention system basically represents the book in the form of a hierarchical outline of containers (e.g., representing volumes or chapters) and subordinate non-containers (e.g., sections). The non-containers are each associated with content entity identifiers indicating the files containing the content (or content entities) in the data repository to be included within the corresponding container and book. The hierarchical outline of containers and content entity identifiers is stored as a separate file object. A user interface enables a user to manipulate the outline to select and alter the book content. In other words, a user may construct and arrange the book (e.g., into volumes, chapters, sections, etc.) with content (e.g., text, images, etc.) selected from the data repository. When the user adds, removes or moves book content, the corresponding content entity identifier is respectively added, removed or moved within the outline. In addition, the present invention provides prerequisite checking, wherein some content entities are associated, and selection by the user of an entity causes automatic inclusion of all associated prerequisite objects in the final compilation. In other words, prerequisite content is some material, A, that is required in a compilation when another piece of material, B, is included in the compilation.

The Examiner takes the position with respect to independent claims 1, 6 and 11 that the Tabuchi patent discloses all the features within these claims, except for the content entity comprising information to be published. The Examiner further alleges that the McGraw-Hill publication discloses this feature and that it would have been obvious to combine the teachings of the Tabuchi patent and McGraw-Hill publication to attain the claimed invention.

This rejection is respectfully traversed. However, in order to expedite prosecution of the subject application, independent claims 1, 6 and 11 have been amended and recite the features of: creating a content object, being one of a book, a document, a collection of images, a collection of musical selections, a video and a multimedia object, from a plurality of individual content entities including content for the content object and stored in a data repository; a prerequisite content entity being associated with another content entity and designated for automatic inclusion in the content objects for which that other content entity is selected and placed; determining if the selected content entity has any prerequisite content entities associated with that content entity, and if so, automatically adding or removing the associated prerequisite content entities to or from the content object. Dependent claims 4, 9 and 14 have been amended for consistency with their amended parent claims.

The Tabuchi patent does not disclose, teach or suggest these features. Rather, the Tabuchi patent discloses a compound document management system comprising a compound document object holding unit for holding a compound document object and a schema object generating unit for generating a schema object and applying the same to a compound document object, the schema object including a structuring rule table (e.g., See Abstract). The system manages a relational structure of each object in a compound document in which data of different formats, such as text and image, is embedded (e.g., See Column 1, lines 9 - 15). A user adds data (e.g., an image) to a compound document via an application program. The application program inquires of the schema object whether the image data can be related to the compound document object. The schema object obtains information from an information database and the

structuring rule table is searched for the existence of a relevant rule enabling the image to be added. If the rule exists, the user is allowed to select the image insertion function. Otherwise, this operation is not permitted (e.g., See Fig. 3 and Column 9, line 61 to Column 10, line 42).

Thus, the Tabuchi patent discloses insertion of data into a compound document based on rules within a rule table defining permitted objects for the document. There is no disclosure, teaching or suggestion of automatic inclusion of additional associated entities based on insertion of a corresponding entity or, for that matter, adding or removing a selected content entity to a content object, determining the prerequisite entities associated with the selected content entity and automatically adding or removing the associated prerequisite entities as recited in the independent claims. In other words, the Tabuchi patent checks a rule table to determine if a selected object can be added to a document, whereas the claims recite determining prerequisite entities associated with an entity selected for addition to or removal from a content object and automatically adding or removing the associated prerequisite entities to or from that object.

The McGraw-Hill publication does not compensate for the deficiencies of the Tabuchi patent. Rather, the McGraw-Hill publication discloses a database containing a collection of modular, stand-alone text files that can be mixed, matched and arranged to create a new book for a particular course. A user may select various portions of existing books to add to the new book being created. The existing books are displayed in a table of contents type format and enable selection of portions for viewing and/or addition to the new book. A user may view the contents of the new book. The contents are displayed, where a user may arrange or reorder the displayed portions to arrange the new book. The McGraw-Hill publication is merely utilized by the

**AMENDMENT**  
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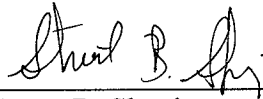
Examiner for an alleged teaching of content entities comprising information to be published (such feature having been removed from the claims).

Since the Tabuchi patent and McGraw-Hill publication do not disclose, teach or suggest, either alone or in combination, the features recited in independent claims 1, 6 and 11 as discussed above, these claims are considered to be in condition for allowance.

Claims 2 - 5, 7 - 10 and 12 - 15 depend either directly or indirectly from independent claims 1, 6 or 11 and, therefore, include all the limitations of their parent claims. These claims are considered to be in condition for allowance for substantially the same reasons discussed above in relation to their parent claims and for further limitations recited in the claims.

The application, having been shown to overcome issues raised in the Office Action, is considered to be in condition for allowance and Notice of Allowance is earnestly solicited.

Respectfully submitted,



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